

Exhibit D

Budget and Staffing Plan

Exhibit D-1

Budget Plan for the Compensation Period

Matter No.	Matter	June 2021		July 2021		August 2021		September 2021		October 2021	
		Actual Fees	Estimated Fees	Actual Fees	Estimated Fees	Actual Fees	Estimated Fees	Actual Fees	Estimated Fees	Actual Fees	Estimated Fees
33260.0007	PROMESA TITLE III: ERS	\$ 2,001.90	\$ 5,000.00	\$ 3,409.80	\$ 5,000.00	\$ 1,309.50	\$ 5,000.00	\$ -	\$ 5,000.00	\$ 1,484.10	\$ 2,000.00
33260.0048	ERS TITLE III - MISCELLANEOUS	\$ -	\$ -	\$ 5,288.60	\$ 5,000.00	\$ 8,615.30	\$ 10,000.00	\$ -	\$ -	\$ -	\$ -
ERS TOTAL		\$ 2,001.90	\$ 5,000.00	\$ 8,698.40	\$ 10,000.00	\$ 9,924.80	\$ 15,000.00	\$ -	\$ 5,000.00	\$ 1,484.10	\$ 2,000.00
ESTIMATED FEES Compensation Period (June 2021 - October 2021) TOTAL:											\$37,000.00
ACTUAL FEES Compensation Period (June 2021 - October 2021) TOTAL:											\$22,109.20
Percent Variance (Actual vs. Budgeted Fees)											40.2% below budget

Exhibit D-2

Staffing Plan for the Compensation Period

Staffing Plan for the Compensation Period¹

Category of Timekeeper²	Number of Timekeepers Expected to Work on The Matter During the Budget Period	Average Hourly Rate³
Partners	8	\$853
Senior Counsel	6	\$853
Associates	8	\$853
e-Discovery Attorneys	5	\$421
Paraprofessionals	7	\$291
Total:	34	

¹ The actual number of timekeepers who worked on this matter during the Compensation Period was 10, and thus 24 fewer than anticipated.

² Attorney Practice Groups: BSGR&B, Litigation, and Corporate.

³ Pursuant to the Engagement Letter, Proskauer's rates increased 4% effective January 1, 2021, yielding a new flat rate for attorneys (partners, senior counsel, and associates) of \$853 per hour, for e-discovery attorneys of \$421 per hour, and for paraprofessionals of \$291 per hour. Rates have not increased during this Compensation Period.